

Resource Recovery Group (RRG) shut down its primary waste receipt/brokering activities on August 27, 1998, as directed by court order. Several above ground storage tanks contained liquid and sludge waste materials and the drum handling building also contained drummed waste materials at the time site operations were suspended.

4. State and local actions to date

As specified by the August 27, 1998 court order, RRG management failed to provide proof of financial assurance which further stipulated that the facility could not receive inbound shipments of any waste materials after that date. The court order did allow for outbound waste shipments only.

For a period of time until recently, the site remained inactive with remnant waste materials contained in a variety of tanks and also in drums located in the former waste drum handling building.

In early June, 2001, U. S. EPA secured site access and conducted a site assessment to evaluate any potential site releases from historic site operations. Several soil, groundwater and containerized waste samples were collected and analyzed. The site assessment revealed impacts to on-site soils and a large volume of liquid hazardous and non-hazardous RCRA waste within tanks, drums and other containers.

On October 8, 2002, U. S. EPA issued a CERCLA Section 106 Administrative Order of Consent (AOC) for the removal of liquid hazardous substances (LHS) stored at the Site. A private responsible party (PRP) Liquids Removal Group was created to facilitate only the removal of liquid wastes at that time. The removal of liquids did not include the removal of tank bottoms including the various sludge/solids. It is currently estimated that there are over 40,000 gallons of sludge/solids in several tanks and drum containers.

The PRP Liquids Removal Group also researched all available Site records and Illinois EPA documents to develop the August 2004, PRP Waste Report. The Waste Report and Weston site assessment was ultimately used to develop the current approach to remove all remnant containerized waste solids; decommission all above ground storage tanks and related structures; and remove impacted surface soils from suspected past site operations.

Current Activities

1. Response activities to date

□ After a series of meetings with the PRP representatives and their oversight contractor, Conestoga-Rovers & Associates, Inc. (CRA), U. S. EPA requested that a Work Plan be submitted for project related removal activities. The PRP's executed the Settlement Agreement in early October, 2005. U. S. EPA received the revised project Work Plan in early October, 2005. The Administrative Order on Consent (AOC) was executed between the respondents and U. S. EPA on October 27, 2005.

□ On November 16, 2005, CRA notified U. S. EPA that a removal contractor, Brandenburg Industrial Services (Brandenburg), was selected to perform tank decommissioning and soil removal activities. On December 5, 2005, the removal contractor initiated mobilization of heavy equipment resources to the site.

□ 15 cubic yards of asbestos containing materials were removed during the weeks of December 5th and 12th, 2005.

- ☐ A chemical sweep was performed on December 5th and 6th, 2005.
- ☐ Brandenburg initiated demolition of empty above ground storage tanks on December 6, 2005.
- ☐ During the week of December 12, 2005, CRA/Brandenburg site representatives collected representative waste samples for disposal characterization at an EQ Treatment Storage Disposal Facility (TSDF). Results are expected in early January of 2006.

Planned Removal Actions

- Decommissioning and scrap metal disposal of empty above ground storage tanks will continue as directed by the OSC.
- Empty 55-gallon drums containers stored inside the drum processing building will be crushed and sent for off-site metal recycling starting in January, 2006.
- Waste sludge and solids contained in tanks and drums, and, impacted soil removal activities are expected to commence during the first quarter of 2006.

Next Steps

- Decommissioning and scrap metal disposal of empty above ground storage tanks will continue as directed by the OSC.
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Key Issues

None

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